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11 UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA
13

14 UNITED STATES OF AMERICA,
15 Plaintiff,
16 v.
17 OMINA KHADIJAH RITSON,
18 Defendant.

CASE NO. 2:24-cr-00058-AC
STIPULATION AND [PROPOSED] ORDER TO
CONTINUE STATUS CONFERENCE AND
EXCLUDE TIME UNDER THE SPEEDY TRIAL
ACT; PROPOSED FINDINGS AND ORDER
DATE: April 24, 2024
TIME: 9:00 a.m.
COURT: Hon. Alison Claire

19 **STIPULATION**

20 Plaintiff United States of America, by and through its counsel of record, and defendant, by and
through defendant's counsel of record, hereby stipulate as follows:

21 1. By previous order, this matter was set for a status conference on April 24, 2024.

22 2. By this stipulation, the parties now jointly move to continue the status conference until
23 May 20, 2024, at 9:00 a.m., and to exclude time between April 24, 2024, and May 20, 2024, under Local
24 Code T4.

25 3. The parties agree and stipulate, and request that the Court find the following:

26 a) The government has provided counsel for defendant with discovery, including
27 agency reports and photographs. In addition, the government has three CDs that use proprietary
28 software that will be produced in the upcoming days.

b) Counsel for defendant desires additional time to review the discovery provided, to consult with her client, and to discuss potential resolutions with her client.

c) Counsel for defendant believes that failure to grant the above-requested continuance would deny them the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of April 24, 2024 to May 20, 2024, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] (reasonable time to prepare) because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

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1 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
2 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
3 must commence.

4 IT IS SO STIPULATED.

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6 Dated: April 18, 2024

PHILLIP A. TALBERT
United States Attorney

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8 _____
9 /s/ HEIKO P. COPPOLA
10 HEIKO P. COPPOLA
11 Assistant United States Attorney

12 Dated: April 18, 2024

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14 /s/ LINDA HARTER
15 LINDA HARTER
16 Counsel for Defendant
17 OMINA KHADIJAH RITSON

18 **[PROPOSED] FINDINGS AND ORDER**

19 IT IS SO FOUND AND ORDERED this 18th day of April, 2024.

20 _____
21 Allison Claire
22 ALLISON CLAIRE
23 UNITED STATES MAGISTRATE JUDGE